

FILED IN OPEN COURT
ON 4-27-16 BC
Julie Richards Johnston, Clerk
US District Court
Eastern District of NC

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

NO. 4:16-CR-27-1 (3)

UNITED STATES OF AMERICA

v.

PATRICIA ANN WARD

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INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. The Federal Emergency Management Agency (FEMA) was an agency of the United States Government within the Department of Homeland Security. FEMA's responsibilities included, among other things, providing disaster assistance to individuals in an area that was declared a major disaster.

2. Pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121 et seq., FEMA was authorized to provide disaster assistance to eligible victims of severe storms and flooding that affected the area in and around Park Ridge, Illinois on or about May 10, 2013.

3. FEMA was also authorized to issue disaster assistance to eligible victims of Hurricane Irene that affected North Carolina on or about August 31, 2011.

4. FEMA's Individuals and Households Program was a program that provided, among other things, financial assistance to individuals who suffered property losses and damage resulting from these storms, which had been declared a major disaster.

FALSE CLAIMS BY PATRICIA ANN WARD

I) False Claim in Connection With the Park Ridge, Illinois Disaster Declaration

5. On or about May 20, 2013, the defendant PATRICIA ANN WARD, a resident of Greenville, North Carolina, submitted to FEMA an application for disaster assistance, falsely claiming that her vehicle, a 2000 Chevrolet Cobalt, had sustained damage in Park Ridge, Illinois, as a result of the May 10, 2013, storms and flooding.

6. Attached to this claim was a false and fictitious receipt from a non-existent auto repair shop in Greenville, North Carolina, which indicated \$5,774.00 in repair charges for parts and labor for WARD'S 2000 Chevrolet Cobalt.

7. In fact and in truth, WARD'S vehicle was in North Carolina at the time that Park Ridge, Illinois had been affected

by severe storms, flooding, and tornadoes on or about February 20, 2013, and it had suffered no flood damage whatsoever.

8. FEMA declined to award any money to WARD and her claim was denied.

II) False Claim in Connection With Hurricane Irene

9. On or about August 31, 2011, PATRICIA ANN WARD, submitted to FEMA an application for disaster assistance, falsely claiming that her vehicle, a 1996 Honda Civic, had sustained flood damage in Greenville, North Carolina, as a result of the Hurricane Irene.

10. Attached to this claim was a false and fictitious receipt from a non-existent auto repair shop in Greenville, North Carolina, which indicated \$5,414.46 in repair charges for parts and labor for WARD'S 1996 Honda Civic.

11. In response to WARD'S false and fraudulent claim, FEMA awarded \$5,414.46 in disaster relief benefits to WARD.

12. In fact and in truth WARD'S vehicle suffered no flood damage whatsoever.

STATUTORY ALLEGATIONS

Count One

18 U.S.C. § 287 - False Claims Against the United States

13. On or about May 20, 2013, in the Eastern District of North Carolina and elsewhere, the defendant, PATRICIA ANN WARD,

did knowingly and willfully make and present, to a department and agency of the United States, to wit, the Department of Homeland Security, Federal Emergency Management Agency, a materially false, fictitious, and fraudulent claim in the approximate amount of five thousand seven hundred and seventy four dollars (\$5,774.00) upon and against the Department of Homeland Security, Federal Emergency Management Agency, that is, an application/registration for disaster assistance, FEMA Form 009-0-1, claiming disaster assistance for damage to her means of transportation as a result of severe storms and flooding in Park Ridge, Illinois, knowing such claim to be false, fictitious, and fraudulent when made and presented, in that she did not sustain any damage to her means of transportation.

All in violation of Title 18, United States Code, Section 287.

Count Two

18 U.S.C. § 287 - False Claims Against the United States

14. On or about August 31, 2011, in the Eastern District of North Carolina and elsewhere, the defendant, PATRICIA ANN WARD, did knowingly and willfully make and present, to a department and agency of the United States, to wit, the Department of Homeland Security, Federal Emergency Management Agency, a materially false, fictitious, and fraudulent claim in

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the approximate amount of five thousand ~~five~~ hundred fourteen dollars and sixteen cents (\$5,414.16) upon and against the Department of Homeland Security, Federal Emergency Management Agency, that is, an application/registration for disaster assistance, FEMA Form 009-0-1, claiming disaster assistance for damage to her means of transportation as a result of Hurricane Irene in North Carolina, knowing such claim to be false, fictitious, and fraudulent when made and presented, in that she did not sustain any damage to her means of transportation.

All in violation of Title 18, United States Code, Section 287.

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREMAN

DATE: 4-26-16

JOHN STUART BRUCE
Acting United States Attorney

BY: Evan Rikhye
EVAN RIKHYE
Assistant United States Attorney